



State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL ASSESSMENT

April 9, 2020

Michael Torres, Remedial Project Manager
U.S. Environmental Protection Agency Region 6
1445 Ross Avenue, 6FS-OS
Dallas, Texas 75214

RE: Baseline Human Health Risk Assessment Work Plan and Conceptual Exposure Model
SBA Shipyard Superfund Site; **AI Number 1478**
9040 Castex landing Road
Jennings, Jefferson Davis Parish, LA

Dear Mr. Torres:

The Louisiana Department of Environmental Quality-Remediation Division (LDEQ-RD) has completed its review of the above-referenced document for the SBA Shipyard Superfund Site in Jennings, Jefferson Davis Parish, Louisiana (AI:1478), dated October 23, 2019, and prepared for the SBA Shipyard PRP Group by EHS Support. Both the LDEQ team leader and our staff toxicologist reviewed the document. Below are the comments to the above-referenced document for incorporation into the USEPA comments.

Technical Review Comments

It is recommended that the exposure assumptions that will be used in the quantitation of exposure be included in the work plan so that there can be agency concurrence prior to the health risk assessment being performed.

From a RECAP perspective:

- It is recommended that this site be addressed under MO-3 so that the most current EPA risk assessment recommendations may be used (exposure assumptions and toxicity information). In addition, recreational and trespasser scenarios as well as sediment and biota (fish ingestion) can only be addressed under MO-3.
- The use of frequency of detection and the toxicity screen described in EPA RAGS-A are not consistent with RECAP. For a COC to be eliminated from further consideration, the concentration in media must be less than or equal to a RECAP SS or RS (or equivalent screening level).
- RECAP requires a water well survey be conducted for a 1-mile radius surrounding the site. These surveys are obtained from the Louisiana Department of Natural Resources database and generally are included in the work plan. In addition, in rural areas, a walking survey is also conducted to determine if there are any non-registered wells that may be in use in the area.
- The groundwater classification for the shallow zone under evaluation at the site was not provided in this document.

- The ingestion of fish from the Mermentau River has been identified as a current and future complete exposure pathway for the recreational fisherman. The only fish species of concern identified in the work plan is catfish, however, there are additional species of recreational concern in this area including striped, largemouth and smallmouth bass, sac-a-lait (crappie), and various sunfish species, freshwater drum, bowfin and gars species, as well as crustaceans such as crawfish. Also, since this river is tidally influenced, estuarine species must also be considered. It is recommended that consideration be given to the requirements provided in the document entitled *Protocol for Issuing Public Health Advisories for Chemical Contaminants in Recreationally Caught Fish and Shellfish* (Louisiana Department of Health; Louisiana Department of Environmental Quality; Louisiana Department of Wildlife and Fisheries, and Louisiana Department of Agriculture and Forestry). This document addresses data collection, health risk assumptions and calculations, when an advisory is warranted, and the requirements for an advisory to be rescinded. The fish data obtained from the investigation will be evaluated per this protocol by the Louisiana Department of Health to determine the need for a fish consumption advisory for the Mermentau River. If an advisory is necessary for the protection of human health for site-related COC, the requirements of this protocol will need to be met in order for the advisory to be lifted and, from an LDEQ perspective, for remediation to be adequate/complete. This protocol was included as to be considered (TBC) criteria to set remedial goals for fish tissue at another Superfund site in Louisiana for which a fish consumption advisory had been issued.
- RECAP defines surface soil from surface to a depth of 15 ft bgs. This is done to ensure that if soils are disturbed during future site use and deeper soils are left at the surface, the COC concentrations in these soils will be protective for direct contact exposure.
- Recreational use of the Mermentau River – this river is frequently used for recreational activities including boating, jet skiing, and chartered paddleboat trips.

Please submit all future correspondence from the PRP group in triplicate, with the **AI number** included to: Percy V. Harris, Administrator, Remediation Services Division, P.O. Box 4314, Baton Rouge, LA 70821-4314

If you have any questions, please feel free to contact Mr. Tommy Doran of my staff via email at tommy.doran@la.gov, or by phone at (225)219-3019.

Thank you for your cooperation.

Sincerely,



Edwin C. Akujobi, E.S. Manager
Remediation Division

htd

c: Imaging Operations – IAS